

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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|---------------------------------------|---|---------------------|
| JOINT APPLICATION OF KNOTT COUNTY |) | |
| WATER AND SEWER, INC. AND |) | |
| TROUBLESOME CREEK ENVIRONMENTAL |) | CASE NO. 2015-00301 |
| AUTHORITY, INC. FOR AN ORDER |) | |
| APPROVING THE TRANSFER OF OWNERSHIP |) | |
| AND CONTROL OF A JURISDICTIONAL ASSET |) | |

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KNOTT COUNTY WATER AND SEWER DISTRICT AND
TROUBLESOME CREEK ENVIRONMENTAL AUTHORITY, INC.

Pursuant to 807 KAR 5:001, Knott County Water and Sewer, Inc. ("Knott Sewer") and Troublesome Creek Environmental Authority, Inc. ("Troublesome Creek"), (collectively "Joint Applicants") are to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Northern District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. In Case No. 2003-00326, the applicant in that proceeding, in describing itself, stated that it was “a water district of Knott County, Kentucky, created and existing under and by virtue of Chapter 74 of the Kentucky Revised Statutes.”¹ In the Joint Application in this case, Knott County Water and Sewer, Inc. identified itself, in pertinent part, as “a Kentucky corporation, originally incorporated on April 16, 2003, that is in good standing and operating as a special district formed under KRS Chapter 74 et. seq.”²

¹ Case No. 2003-00326, *The Application of Knott County Water and Sewer District for a Certificate of Public Convenience and Necessity to Construct and Finance Pursuant to the Provisions of KRS 278.023* (Ky. PSC filed Aug. 25, 2003), Application at 1.

² Application at 1.

a. State whether Knott County Water and Sewer, Inc., is the same utility that filed the application in Case No. 2003-00326. If so, explain and reconcile the difference in the descriptions in the two applications.

b. State why Knott County Water and Sewer, Inc., is incorporated pursuant to KRS Chapter 273. Include in the response whether Knott County Water and Sewer, Inc., was created in accordance with the procedures of KRS 65.810 or KRS Chapter 220.

2. Per the tariffs on file with the Commission for the Knott County Water and Sewer District, Knott County Water and Sewer District adopted the tariffs of the Caney Creek Water and Sewer District on February 10, 1999.³ State whether the tariffs of the Knott County Water and Sewer District on file with the Commission are the tariffs of Knott County Water and Sewer, Inc. If not, indicate why Knott County Water and Sewer, Inc., does not have tariffs on file with the Commission.

3. Per the most recent Annual Report of the Knott County Water and Sewer District on file with the Commission, the utility stated that it was organized on February 10, 1999.⁴ Reconcile the February 10, 1999 date of organization per the Annual Report with the April 16, 2003 date of incorporation stated in the application in this case.

DATED OCT 30 2015

cc: Parties of Record


Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

³ *Knott County Water and Sewer District Rates, Rules and Regulation for Water and Sewer Services*, P.S.C. Ky. Adoption Notice No. 1.

⁴ *Annual Report of Knott County Water and Sewer District to the Public Service Commission for Year Ended December 31, 2014*, at 10 and 11.

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